

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ContentGuard Holdings, Inc.,

*Plaintiff,*

v.

Amazon.com, Inc.; Apple Inc.; BlackBerry Limited (fka Research In Motion Limited) and BlackBerry Corporation (fka Research In Motion Corporation); HTC Corporation and HTC America, Inc.; Huawei Technologies Co., Ltd. and Huawei Device USA, Inc.; Motorola Mobility LLC; Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC,

*Defendants.*

Civil Action No. 2:13-cv-01112-JRG

JURY TRIAL DEMANDED

**NOTICE OF COMPLIANCE**

Pursuant to Paragraph 12 of the Amended Protective Order Regarding the Disclosure and Use of Discovery Materials (Dkt. No. 152), notice is given that Plaintiff ContentGuard Holdings, Inc. produced third-party confidential information in compliance with the Amended Protective Order and verifies as follows:

1. **Fujitsu:** ContentGuard notified Fujitsu of its intent to produce information by letter dated November 26, 2014, sent by email and overnight delivery. Fujitsu responded via email on December 10, 2014. Fujitsu requested that certain specific information relating to another party be omitted from the production. Otherwise, Fujitsu consented to the production of the materials as confidential, attorneys' eyes only. The material Fujitsu requested redacted appears irrelevant

to the claims and defenses in the case. Accordingly, ContentGuard has produced the documents with the requested redactions as confidential attorneys' eyes only.

2. **Sharp:** ContentGuard notified Sharp of its intent to produce information by letter dated November 26, 2014, sent by email and overnight delivery. Sharp responded via email on December 3, requesting the redaction of certain information relating to patents that are neither in suit, nor in the same chain of priority as the patents in suit, nor foreign counterparts. ContentGuard has produced the documents with the requested redactions as confidential attorneys' eyes only.
3. **Kyocera:** ContentGuard notified Kyocera of its intent to produce information by letter dated December 1, 2014, sent by overnight delivery. Kyocera responded via email on December 10 that it would be objecting to the production of the information.

Dated: December 15, 2014

Respectfully submitted,

*/s/ Sam Baxter*  
\_\_\_\_\_  
Samuel F. Baxter  
Texas Bar No. 01938000  
sbaxter@mckoolsmith.com  
MCKOOL SMITH P.C.  
104 East Houston, Suite 300  
Marshall, Texas 75670  
Telephone: (903) 923-9000  
Facsimile: (903) 923-90099

Robert A. Cote  
rcote@mckoolsmith.com  
Radu A. Lelutiu  
rlelutiu@mckoolsmith.com  
MCKOOL SMITH P.C.  
One Bryant Park, 47<sup>th</sup> Floor  
New York, New York 10036  
Telephone: (212) 402-9400  
Facsimile: (212) 402-9444

Holly E. Engelmann  
hengelmann@mckoolsmith.com  
Seth Hasenour  
shasenour@mckoolsmith.com  
MCKOOL SMITH P.C.  
300 Crescent Court, Suite 1500  
Dallas, Texas 75201  
Telephone: (214) 978-4000  
Facsimile: (214) 978-4044

*Counsel for ContentGuard Holdings, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic services on December 15, 2014. Local Rule CV-5(a)(3)(A).

/s/ Holly Engelmann \_\_\_\_\_